

**FILED**

8/7/2019

BG

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**RECEIVED**

JUN 17 2019

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

RAYVON PARKER #2019-

0328178

JUDGE JORGE L. ALONSO

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Case No: 19-C-0820  
(To be supplied by the Clerk of this Court)

CITY OF CHICAGO, OFFICERS-

MYLES, FARIAS, CUEVAS, SGT

CORTESE, JAGIELSKI, MENAGH,

MIYER, DETECTIVE MEDEM-

OTT, DETECTIVE TIMOTHY

LARMON, A SA PAULINSKI

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:

AMENDED COMPLAINT

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**I. Plaintiff(s):**

- A. Name: RAYUON E. PARKER
- B. List all aliases: N/A
- C. Prisoner identification number: 20190328178
- D. Place of present confinement: COOK COUNTY JAIL
- E. Address: 2600 S. CALIFORNIA, CHICAGO, IL, 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: CITY OF CHICAGO  
 Title: CITY OF CHICAGO  
 Place of Employment: ~~CHICAGO~~ CITY OF CHICAGO
- B. Defendant: OFFICER MYLES  
 Title: CHICAGO POLICE OFFICER  
 Place of Employment: CHICAGO POLICE DEPARTMENT
- C. Defendant: OFFICER FARIAS  
 Title: CHICAGO POLICE OFFICER  
 Place of Employment: CHICAGO POLICE DEPARTMENT

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)



## II DEFENDANT(S):

- D. DEFENDANT: OFFICER CUEVAS  
TITLE: CHICAGO POLICE OFFICER  
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- E. DEFENDANT: SGT. CORTESE  
TITLE: CHICAGO POLICE SGT.  
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- F. DEFENDANT: OFFICER JAGIELSKI  
TITLE: CHICAGO POLICE OFFICER  
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- G. DEFENDANT: OFFICER MENAGH  
TITLE: CHICAGO POLICE OFFICER  
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- H. DEFENDANT: OFFICER MILLER  
TITLE: CHICAGO POLICE OFFICER  
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- I. DEFENDANT: DETECTIVE MCDEMOTT  
TITLE: CHICAGO POLICE DETECTIVE  
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- J. DEFENDANT: DETECTIVE TIMOTHY LARMON  
TITLE: CHICAGO POLICE DETECTIVE  
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- K. DEFENDANT: ASA PAULINSKI  
TITLE: ASSISTANT STATE'S ATTORNEY  
PLACE OF EMPLOYMENT: COOK COUNTY STATE'S ATTORNEY OFFICE



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: PARKER V. CASTILLO  
13-C-6003
- B. Approximate date of filing lawsuit: AUGUST 2013
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ~~XXXXXXXXXX~~  
N/A
- D. List all defendants: CIO COUCH, JULIO CASTILLO
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICT OF ILLINOIS
- F. Name of judge to whom case was assigned: N/A
- G. Basic claim made: EXCESSIVE FORCE
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): SETTLED
- I. Approximate date of disposition: SEPTEMBER 2017

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**



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## III.

- A. PARKER V. OWNER CHARLIE, 17-C-5764
- B. JULY 2017?
- C. N/A
- D. STORE OWNER CHARLIE
- E. NORTHERN DISTRICT OF ILLINOIS
- F. JUDGE SHAH
- G. DEFAMATION
- H. DISMISSED
- I. AUGUST 2017?

- A. PARKER V. STATES ATTORNEY OFFICE, 18-C-4860
- B. AUGUST 2018?
- C. N/A
- D. STATES ATTORNEY OFFICE CHICAGO POLICE DEPARTMENT
- E. NORTHERN DISTRICT OF ILLINOIS
- F. JUDGE BUCKLO
- G. MALICIOUS PROSECUTION
- H. DISMISSED
- I. N/A

- A. PARKER V. BURG, 17-C-5177
- B. JULY 2017
- C. N/A
- D. BRYAN ZYDEK, BRIAN BURG
- E. NORTHERN DISTRICT OF ILLINOIS
- F. JUDGE DOW, JR.
- G. FALSE ARREST, FALSE IMPRISONMENT
- H. PENDING
- I. MAY 2019

- A. PARKER V. DART, 18-C-4274
- B. 2018?
- C. N/A
- D. THOMAS J. DART, DEPUTY VASQUEZ, JOHN DOE
- E. NORTHERN DISTRICT OF ILLINOIS
- F. JUDGE NORGLE
- G. FALSE ARREST, FALSE IMPRISONMENT
- H. PENDING
- I. MAY 2019

- A. PARKER V. CITY OF CHICAGO, 19-C-00820
- B. FEBRUARY 2019
- C. N/A
- D. OFFICERS MYLES, FARIAS, CUEVAS, SGT. CORTESE, JAGIELSKI, MENAGH, MILLER, MCDEMOTT, LARHON, ASA PAULSEN
- E. NORTHERN DISTRICT OF ILLINOIS
- F. JUDGE ALONSO
- G. FALSE ARREST, FALSE IMPRISONMENT, OFFICIAL MISCONDUCT, DELIBERATE INDIFFERENCE
- H. DISMISSED?
- I. 2019?

- A. PARKER V. CORTES, 19-C-00576
- B. 2019?
- C. N/A
- D. C/O CORTES, C/O GALVEZ, C/O DEVINE
- E. NORTHERN DISTRICT OF ILLINOIS
- F. N/A
- G. EXCESSIVE FORCE
- H. DISMISSED?
- I. N/A

- PAGE 3 - CONTINUED

PARKER V. CITY OF CHICAGO  
CASE NO. 19-C-0820



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

ON JUNE 4, 2017, CHICAGO POLICE DEPARTMENT OFFICERS MYLES, FARIAS, CUEVAS, SGT. CORTESE, JAGIELSKI, MENAGH AND MILLER EFFECTUATED A WARRANTLESS ARREST OF ME AFTER THEIR ILLEGAL ENTRY INTO AN APARTMENT I HAD A REASONABLE EXPECTATION OF PRIVACY. DECEMBER 21, 2018, CIRCUIT COURT JUDGE ERICA L. REDDICK GRANTED A MOTION TO SUPPRESS EVIDENCE ILLEGALLY SEIZED BY DEFENDANT OFFICERS IN MY FAVOR. BY WAY OF THE SUPPRESSION OF EVIDENCE ILLEGALLY SEIZED, ARMED HABITUAL CRIMINAL, UUN BY FELON CHARGES STEMMING FROM MY UNLAWFUL ARREST JUNE 4, 2017, WERE DROPPED. OFFICER FARIAS TESTIFIED AT MY MOTION TO SUPPRESS EVIDENCE ILLEGALLY SEIZED HEARING IN FRONT OF JUDGE ERICA L. REDDICK THAT I WAS NOT OBSERVED COMMITTING A CRIMINAL OFFENSE, FARIAS NOR ANY OTHER CPD OFFICER HAD NOT SEEN ME COMMIT A CRIMINAL OFFENSE, THEREFORE HER HONOR RULED THAT CPD OFFICERS HAD NO PROBABLE CAUSE TO ARREST ME. THE ARMED ROBBERY CHARGES CAME AFTER MY UNLAWFUL ARREST AND WERE ALSO DROPPED JANUARY 4, 2019, DUE TO HER HONORS RULING THAT MY FOURTH AMENDMENT CONSTITUTIONAL RIGHTS WAS VIOLATED

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

JUNE 4, 2017, BY ALL DEFENDANT OFFICERS NAMED ABOVE. DETECTIVE MCDEMOTT, AND DETECTIVE TIMOTHY LARMON OF THE CPD FALSIFIED DOCUMENTS THAT A JUDGE USED TO DETERMINE PROBABLE CAUSE <sup>IS</sup> AS NECESSARY FOR FURTHER DETENTION. DETECTIVE MCDEMOTT AND DETECTIVE LARMON ARE LIABLE FOR THE UNLAWFUL PRETRIAL DETENTION OF MY PERSON UNDER THE FOURTH AMENDMENT. I AM SUING ALL NAMED DEFENDANTS IN THEIR INDIVIDUAL AND OFFICIAL CAPACITY FOR VIOLATION OF MY FOURTH AMENDMENT AND OFFICIAL MISCONDUCT. DETECTIVE TIMOTHY LARMON GAVE FALSE TESTIMONY TO A GRAND JURY WITH TOTAL DISREGARD FOR THE TRUTH. ASSISTANT STATE'S ATTORNEY PAULINSKI ALONGSIDE DETECTIVE LARMON PRESENTED EVIDENCE TO A GRAND JURY THAT BOTH KNEW TO BE FALSE. THE EVIDENCE WAS NOT INITIALLY PRESENTED TO THEM IN THEIR PROFESSIONAL CAPACITY BY A REASONABLY CREDIBLE WITNESS OR VICTIM. THE FALSE STATEMENTS WERE PRESENTED WITH MALICE, RECKLESSNESS, AND DECEIT. THE TESTIMONY PRESENTED TO THE GRAND JURY IS PERJURY. THEREFORE ASA PAULINSKI IS LIABLE FOR MY UNLAWFUL PRETRIAL DETENTION UNDER THE FOURTH AMENDMENT AND ALSO FOR OFFICIAL MISCONDUCT AND MALICIOUS PROSECUTION. ALL DEFENDANTS NAMED ABOVE ARE PUBLIC OFFICIALS EMPLOYED WITH THE CITY OF CHICAGO. I AM ALSO SUING ALL NAMED DEFENDANTS FOR PAIN AND SUFFERING.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I AM ASKING TO BE COMPENSATED FOR ACTUAL LOSSES, COMPENSATORY AND PUNITIVE DAMAGES. PAIN AND SUFFERING IN EXCESS OF ~~10~~ \$5 MILLION DOLLARS OR WHATEVER A JURY SEE FIT TO AWARD ME.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 21 day of MAY, 2019

Raymon Parker  
(Signature of plaintiff or plaintiffs)

RAYMON PARKER  
(Print name)

20190328178  
(I.D. Number)

2600 S. CALIFORNIA AVE, CHICAGO  
ILLINOIS 60608 P.O. Box 089002  
(Address)



RAYVON PARKER  
#Z0190328178  
P.O. BOX 089002  
CHICAGO, IL 60608

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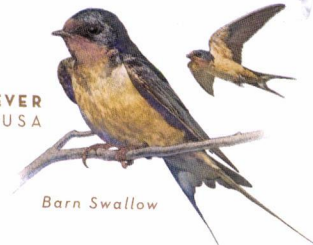
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FOREVER  
USA



Barn Swallow



06/17/2019-24

PRISONER CORRESPONDENCE

219 SOUTH DEARBORN STREET

CHICAGO, ILLINOIS 60604

60604-202563



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